

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MORGAN KUKOVEC,
INDIVIDUALLY AND ON BEHALF
OF ALL OTHERS SIMILARLY
SITUATED,

Plaintiff,

Case No. 1:22-cv-03829

Hon. Jeffrey T. Gilbert, *presiding*

L'ORÉAL USA, INC. D/B/A
L'ORÉAL PARIS,

Defendant.

JOINT MOTION FOR ENTRY OF STIPULATED ESI PROTOCOL

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure (the “Rules”), Plaintiff Morgan Kukovec (“Plaintiff” or “Kukovec”) and Defendant L’Oréal USA, Inc. (“L’Oréal USA”) (“Defendant”) (collectively, the “Parties”), by and through their respective counsel, hereby jointly request that the Court enter a Stipulated ESI Protocol. In support of this motion, the Parties state as follows:

1. The Parties have negotiated a Stipulated ESI Protocol, which was previously filed as Dkt. #86.

2. According to the Court’s procedures under Submitting a Proposed Order, and in accordance with the Court’s Minute Entry, Dkt. #89, the Parties are simultaneously submitting to the Court a proposed Stipulated ESI Order.

WHEREFORE, for the foregoing reasons, the Parties respectfully request that the Court enter the Stipulated Protective Order.

Date: February 4, 2025

Respectfully Submitted,

/s/ Elizabeth C. Chavez, Esq.

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